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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

OSVALDO TORRES,)	Case No. 2:18-cv-0027-RFB-VCF
)	
Plaintiff,)	
)	
v.)	STIPULATION AND ORDER
)	TO EXTEND SCHEDULING
ALLIANCE PLASTICS, LLC,)	ORDER DEADLINES
)	(First Request)
Defendant.)	

The parties, by and through their respective counsel, hereby stipulate to extend the Scheduling Order deadlines in this case as follows:

Discovery (Currently July 30, 2018):	October 31, 2018 ¹
Dispositive Motions (Currently August 29, 2018):	November 30, 2018
Joint Pretrial Order (Currently September 28, 2018):	December 31, 2018 or 30 days from the ruling on a dispositive motion

¹ The discovery extension applies only to those depositions noticed before the end of the current discovery deadline; a general extension for discovery is not sought.

1 This is the first request for an extension of these deadlines. The parties provide
2 the following information to the Court regarding the proposed extension of the discovery
3 deadline.

4 ***Discovery Completed To Date***

5 The parties have served their Initial Disclosures. Defendant has served
6 interrogatories and requests for production, and Plaintiff has responded (although
7 Defendant believes some of the responses are deficient and intends to address these
8 deficiencies).

9 ***Remaining Discovery To Be Completed***

10 Defendant has noticed Plaintiff's deposition for July 23. Plaintiff has noticed a
11 24-subject FRCP 30(b)(6) deposition.

12 ***Reasons Discovery Could Not Be Completed Within The Existing Deadline***

13 None of the witnesses who will be designated to respond to the Rule 30(b)(6)
14 deposition are believed to reside or work in Nevada, and travel arrangements must be
15 made. Plaintiff's counsel and Defendant's lead counsel are scheduled to participate in
16 the same arbitration hearing on August 14 and 15, 2018, and lead defense counsel has a
17 trial scheduled on a September 10 – October 12, 2018 trial stack, and additional time may
18 be needed to complete these depositions.

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Proposed Dates for Completion of Discovery

The parties believe they will be able to complete discovery by the proposed new date of October 31, 2018.

Dated this 9th day of July 2018.

FISHER & PHILLIPS

KEMP & KEMP

By: /s/ Holly E. Walker, Esq.

By: /s/ James P. Kemp, Esq.

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IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

Dated: 7-10-2018